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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

**TO:** Tammy Joell Zeimet  
7900 Reina Court  
Bakersfield, CA 93309

Pamela Jo Tarango  
3142 Audubon Drive  
Bakersfield, CA 93301

Judie Sabac Magsayo  
2128 Erickson Way  
Stockton, CA 95206

Sokuno Ouk  
369 Jill Circle  
Stockton, CA 95210

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 25110 and 25401 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. Tammy Joell Zeimet is an individual who currently resides at 7900 Reina Court, Bakersfield, California, 93309.
2. Pamela Jo Tarango is an individual who currently resides at 3142 Audubon Drive, Bakersfield, California, 93301.
3. Judie Sabac Magsayo is an individual who currently resides at 2128 Erickson Way, Stockton, California, 95206.

- 1           4. Sokuno Ouk is an individual who currently resides at 369 Jill Circle, Stockton,  
2           California, 95210.  
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- 4           5. During 2001, 2002, and 2003, Zeimet, Tarango, Magsayo, and Ouk were active  
5           participants in an organization operating under the name of Women Helping Women  
6           (WHW), Women Empowering Women (WEW), Women Helping Women Dinner Party  
7           (DP), or The Women’s Garden Party or Garden Circle (WGP).  
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- 9           6. WHW, WEW, DP, and WGP operated as a pyramid scheme.  
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- 11          7. Women in these groups operated by inviting women to a “potluck” gathering at  
12          individual’s homes and/or community centers or conference rooms. The gathering was  
13          described as a “support group.” During the gatherings, women would be recruited to  
14          contribute money to the group.  
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- 16          8. New members to the group contributed an amount from \$625 (1/8 a share) to \$5,000 (1  
17          full share) to join at the lowest level, then moved up level by level by bringing in new  
18          contributors until, theoretically, they reached the top of the pyramid and received a payoff,  
19          called a “birthday,” of as much as \$40,000. The DP group used metaphors for the levels  
20          such as “appetizer,” “soup and salad,” and “entrée.” The WGP used metaphors for the  
21          levels such as “bud,” “bloom,” and “bouquet.”  
22
- 23          9. Members moved through the levels by recruiting new members for the lower levels. It  
24          appeared often that the promoters of these groups committed fraud in order to secure  
25          payoffs regularly for themselves instead of the women going through the levels.  
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- 1 10. New members of these groups were told that the scheme is a charitable activity to help  
2 women in need and that the “gifts” of up to \$5,000 each did not need to be reported to the  
3 Internal Revenue System.  
4
- 5 11. These groups kept charts of the pyramid and who had given what amount and assigned  
6 women to be “monitors” of the charts to keep track of who was in line for a “birthday.”  
7 Women were encouraged, if not directed, not to use their full name, but only their first  
8 name and last initial on the charts. They were often encouraged to make up a name for use  
9 on these charts.  
10
- 11 12. Initially, women who first joined these groups were able to find recruits with promises of  
12 large returns for small amounts invested. New recruits would come to a meeting where a  
13 member would have a “birthday” and receive up to \$40,000 cash. New recruits filled the  
14 charts creating pyramids that allowed many women to be paid “birthday” prizes.  
15
- 16 13. Eventually, however, mathematic reality occurred and the newer members ran out of  
17 women to recruit. At this point, the pyramid scheme collapsed and all the women on the  
18 bottom of the pyramid lost their investment in the scheme.  
19
- 20 14. During 2002 and 2003, a large, but unknown number of women fell victim to the pyramid  
21 scheme of WHW, WEW, DP, and WGP and lost anywhere from hundreds to tens of  
22 thousands of dollars each.  
23
- 24 15. Zeimet, Tarango, Magsayo, and Ouk all actively participated in leadership roles in Central  
25 California (located in San Joaquin County and Kern County) groups entitled WHW,  
26 WEW, DP, or WGP. Each of the named individuals also received “birthday” gifting from  
27 the scheme.  
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1 16. Zeimet, Tarango, Magsayo, and Ouk each actively participated in giving women (new  
2 recruits) information at meetings and through e-mail that included the following facts: the  
3 group was not a pyramid scheme; the group was a “charitable organization;” women  
4 joined not expecting to make money; and the amount “gifted” or given to the group was  
5 not an “investment.” At the time of these statements, each of the individuals named did in  
6 fact know that the group was paying women for their “birthday” with money coming from  
7 new recruits, thus the investment scheme did operate as a pyramid scheme. Each of the  
8 individuals named also had joined and were members of the group in order to make  
9 money and brought in new recruits with the advertisement of making eight times the  
10 amount invested.

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12 17. Pursuant to state law and federal case law, pyramid schemes are securities and are  
13 inherently fraudulent.

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15 18. Neither Zeimet, Tarango, Magsayo, nor Ouk is licensed or authorized to sell securities in  
16 California.

17  
18 Based upon the foregoing findings, the California Corporations Commissioner is of the  
19 opinion that investments in WHW, WEW, DP, or WGP were securities in the form of investment  
20 contracts that were being offered by inter alia, Tammy Joell Zeimet, Pamela Jo Tarango, Judie Sabac  
21 Magsayo, and Sokuno Ouk in issuer transactions in California without the sales having been  
22 qualified, in violation of Corporations Code section 25110.

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24 In addition, the Commissioner is of the opinion that the securities were being offered by inter  
25 alia, Tammy Joell Zeimet, Pamela Jo Tarango, Judie Sabac Magsayo, and Sokuno Ouk by means of  
26 verbal and written communications that included untrue statements of material fact and omissions of  
27 material facts in violation of Corporations Code section 25401.

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